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For The Northern Mariana Islands
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UNITED STATES DISTRICT COURT
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA)

Criminal Case No. 05-00025

Plaintiff,)

v.)

**GOVERNMENT'S MOTION FOR
SUBSTANTIAL ASSISTANCE
DEPARTURE UNDER USSG §5K1.1**

VIVIAN MENDIOLA FLEMING,)

Defendant.)

Pursuant to Section 5K1.1 of the United States Sentencing Guidelines, the plaintiff,
United States of America, hereby moves the Court to depart from the advisory Sentencing
Guidelines, based on defendant's substantial assistance to the government.

The government recommends a 50% departure from the bottom of the advisory guideline
range as calculated in the pre-sentence report.

Respectfully submitted,

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By: _____

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Assistant United States Attorney